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8

9 UNITED STATES DISTRICT COURT

10 DISTRICT OF NEVADA

11 TERESITA GONZALES, an individual;

12 Plaintiff,

13 vs.

14 STATE FARM MUTUAL AUTOMOBILE  
INSURANCE COMPANY, an Illinois  
15 Company; DOES I through X; and ROE  
CORPORATIONS XI through XX,  
16

17 Defendants.

CASE NO.: 2:15-cv-00428-GMN-CWH

STIPULATION AND ORDER TO  
EXTEND DISCOVERY DEADLINES  
(FIRST REQUEST)

SUBMITTED IN COMPLIANCE WITH LR  
26-1(e)

18 Defendant, State Farm Mutual Automobile Insurance Company ("State Farm"), and  
19 Plaintiff, Teresita Gonzales, by and through their respective counsel, and pursuant to  
20 Local Rule 26-4, stipulate to modify their discovery plan as follows:

21 1. Plaintiff filed her Complaint in the District Court for Clark County, Nevada on  
22 February 5, 2015. State Farm removed the action to this Court on March 11, 2015 (Doc.  
23 1).

24 2. State Farm filed its answer to the Complaint on March 11, 2015 (Doc. 5).

25 3. The parties held their F.R.C.P. 26 conference on March 31, 2015 and filed  
26 their initial Stipulated Discovery Plan and Scheduling Order in compliance with F.R.C.P.  
27 26(f) and LR 26-1(e) on April 1, 2015 (Doc. 10). In this initial discovery plan, the parties  
28 agreed to the following dates:

1 Last day of discovery: September 15, 2015

2 Last day to amend/add: June 26, 2015

3 Initial expert disclosure: July 27, 2015

4 Rebuttal expert disclosure: August 26, 2015

5 Dispositive motions filed: October 23, 2015

6 Joint pre-trial order: November 20, 2015

7 This initial discovery plan was signed by United States Magistrate Judge Carl W.  
8 Hoffman on April 21, 2015 (Doc. 12).

9 4. In compliance with Local Rule 26-4, the parties provide the following  
10 information regarding the discovery status:

11 a. Discovery Completed: The parties have exchanged initial disclosures  
12 of witnesses and documents, have served written discovery and conducted Plaintiff's  
13 deposition. State Farm is still in the process of independently obtaining Plaintiff's  
14 voluminous medical records from her medical providers arising out of the subject accident  
15 and providing them to State Farm's medical expert for review.

16 b. Discovery that remains to be completed: Additional time is needed for State  
17 Farm to obtain Plaintiff's relevant pre and post accident medical records. Additional  
18 depositions of Plaintiff's treating physicians may also be necessary, depending on further  
19 information provided in records that State Farm is still in the process of obtaining.  
20 Additional time is also needed for State Farm to conduct Plaintiff's Independent Medical  
21 Examination.

22 c. Reasons why discovery was not completed: The parties' current Discovery  
23 Plan and Scheduling Order (Doc. 12) does not provide sufficient time to allow State Farm  
24 to obtain all of Plaintiff's medical records, or to complete Plaintiff's Independent Medical  
25 Examination. Additional time for discovery is necessary to avoid prejudice and to  
26 facilitate a fair and just investigation of Plaintiff's alleged injuries and with respect to  
27 Plaintiff's claims against State Farm.

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d. Proposed schedule for completion of remaining discovery (extension of remaining deadlines by approximately 60 days):

Last day of discovery:	November 13, 2015
Last day to amend/add:	August 25, 2015
Initial expert disclosure:	September 25, 2015
Rebuttal expert disclosure:	October 23, 2015
Dispositive motions filed:	December 22, 2015
Joint pre-trial order:	January 19, 2016

DATED this 2<sup>nd</sup> day of July, 2015.

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By /s/ Danielle C. Miller  
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DATED this 2<sup>nd</sup> day of July, 2015.

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IT IS SO ORDERED:

  
UNITED STATES MAGISTRATE JUDGE

DATED: July 6, 2015